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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

THOMAS ABBRUZZESE *et al.*,

Defendants.

No. 2:24-CV-1717-JNW

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEFENDANTS'
TIME TO RESPOND TO COMPLAINT
(DKT. 78) AND MODIFYING BRIEFING
SCHEDULE FOR VALVE
CORPORATION'S MOTION FOR A
PRELIMINARY INJUNCTION (DKT. 79)**

**NOTE ON MOTION CALENDAR:
SEPTEMBER 9, 2025**

1 Plaintiff Valve Corporation (“Valve”) and all 572 Defendants (collectively, “Defendants”)
2 hereby stipulate as follows:

3 **WHEREAS**, on August 21, 2025, Valve filed a Complaint in this action brought “against
4 each separately named Defendant” (Dkt. 78 ¶ 229);

5 **WHEREAS**, Valve seeks relief as to “each Defendant” (Dkt. 78 ¶¶ 230–251);

6 **WHEREAS**, on August 21, 2025, Valve filed a Motion for a Preliminary Injunction
7 seeking relief as to all Defendants (Dkt. 79), noting the Motion for a Preliminary Injunction for
8 September 26, 2025;

9 **WHEREAS**, Bailey Duquette P.C. filed a Notice of Appearance on behalf of all
10 Defendants in this action;

11 **WHEREAS**, Defendants’ current deadline to respond to the Complaint is September 11,
12 2025;

13 **WHEREAS**, Defendants’ current deadline to file any Opposition to the Motion for a
14 Preliminary Injunction is September 11, 2025;

15 **WHEREAS**, Defendants’ counsel has requested on behalf of all Defendants, and Valve has
16 agreed to, an extension of the foregoing deadlines; and

17 **WHEREAS**, the parties agree that an (i) extension of Defendants’ deadline to respond to
18 the Complaint and (ii) an agreed-upon briefing schedule for the Motion for a Preliminary
19 Injunction will further the orderly administration of this action.

20 **NOW THEREFORE, IT IS HEREBY STIPULATED** by and among the undersigned
21 counsel for the parties, subject to approval of the Court, that:

- 22 (i) Defendants shall have up to and including October 3, 2025, to respond to the
23 Complaint;
- 24 (ii) Defendants shall have up to and including September 19, 2025, to file their
25 Opposition to the Motion for a Preliminary Injunction, and Valve shall have up to and
26 including October 3, 2025, to file a Reply in further support of the Motion for a

Preliminary Injunction;

(iii) The Motion for a Preliminary Injunction is re-noted for October 10, 2025; and

(iv) This Stipulation is without prejudice to, or waiver of, any rights or defenses otherwise available to the parties.

DATED: September 9, 2025

CORR CRONIN LLP

By: s/ Blake Marks-Dias

Blake Marks-Dias, WSBA No. 28169
1015 Second Avenue, Floor 10
Seattle, WA 98104
(206) 625-8600 Phone
(206) 625-0900 Fax
bmarksdias@corrchronin.com

Michael W. McTigue Jr., *Admitted Pro Hac Vice*
Meredith C. Slawe, *Admitted Pro Hac Vice*
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, NY 10001
michael.mctigue@skadden.com
meredith.slawe@skadden.com

Attorneys for Plaintiff Valve Corporation

BAILEY DUQUETTE P.C.

By: s/ William R. Burnside

William R. Burnside, WSBA No. 36002
800 Fifth Avenue, Suite 101-800
Seattle, WA 98104
will@baileyduquette.com

William Bucher
BUCHER LAW PLLC
350 Northern Blvd.
STE 324-1519
Albany, NY 12204-1000

Attorneys for Defendants

STIPULATION
No. 2:24-CV-1717-JNW

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 DATED this __ day of September, 2025

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The Honorable Jamal N. Whitehead
UNITED STATES DISTRICT JUDGE

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CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900